

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TONY KOLE and GHOST INDUSTRIES, LLC,)	
an Illinois limited liability company,)	
)	
Plaintiffs,)	
)	Case No. 11 CV 3871
v.)	
)	
VILLAGE OF NORRIDGE, an Illinois municipal)	
corporation,)	
)	
Defendant.)	

MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

NOW COME the Plaintiffs, Tony Kole and Ghost industries, LLC, an Illinois limited liability company, and, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure (F.R.Civ.P. 15(a)(2)), move this Honorable Court to grant Plaintiffs leave to file their Second Amended Complaint in this matter. In support thereof, Plaintiffs state as follows:

1. On March 22, 2013, March 28, 2013 and April 19, 2013, the Court dismissed, or declined to dismiss, certain claims and/or parties from Plaintiffs' Amended Complaint.
2. On June 24, 2013, the Court ordered Plaintiffs to file a Second Amended Complaint and this Motion.
3. The proposed Second Amended Complaint is attached, and addresses the concerns in the Court's April 19, 2013 Order.

WHEREFORE, the Plaintiffs, Tony Kole and Ghost Industries, LLC, an Illinois limited liability company, request this Honorable Court to grant Plaintiffs leave to file their Second

Amended Complaint, *instantly*, as well as any and all further relief as this Court deems just and proper.

Dated: July 9, 2013

Respectfully submitted,

By: /s/David G. Sigale
David G. Sigale

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On July 9, 2013, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

 /s/ David G. Sigale
Attorney for Plaintiffs

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